

**AMERICAN  
ATHEISTS**

Geoffrey T. Blackwell &lt;gblackwell@atheists.org&gt;

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**American Atheists, et al. v. Rapert - Discovery matters**

3 messages

**Geoffrey T. Blackwell** <gblackwell@atheists.org>

Tue, Aug 24, 2021 at 10:33 AM

To: "William C. Bird III" &lt;william.bird@arkansasag.gov&gt;, Paul Byrd &lt;paul@paulbyrdlawfirm.com&gt;

Cc: Abtin Mehdizadegan &lt;abtin@cgwg.com&gt;

Good morning.

As we discussed in our conference call, here is the amended Request for Production No. 6 from Plaintiffs' first set of discovery requests to Defendant in his official capacity:

REQUEST FOR PRODUCTION NO. 6: Produce all emails, letters, faxes, text messages, social media posts and messages, and other correspondence sent by you on or after January 1, 2014, containing the words "block," "ban," or "mute" and any of the following terms and phrases:

- a. Barringer;
- b. Dempsy;
- c. Shoshone;
- d. Fernau;
- e. Godless;
- f. Atheist;
- g. Humanist;
- h. Satanist;
- i. Nonbeliever;
- j. Nonreligious;
- k. Secular;
- l. Heathen;
- m. Infidel;
- n. Leftist;
- o. Socialist;
- p. Communist;
- q. Muslim;
- r. Islamic;
- s. "Church and state";
- t. "Project Blitz";
- u. "Christian country"; and
- v. "Christian nation".

Regarding your question about the classes of Facebook data requested in Request for Production No. 4 from Plaintiffs' first set of discovery requests to Defendant in his official capacity, Mr. Bird, we are requesting a complete copy of the identified accounts.

You indicated during the call that you would know by Wednesday, August 18th, whether your client would be willing to produce any of his social media data. Do you have an answer for us on that issue?

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**Geoffrey T. Blackwell, Esq.**

(he/him/his)

Litigation Counsel

American Atheists Legal Center

American Atheists, Inc.

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**William C. Bird III** <william.bird@arkansasag.gov>

Tue, Aug 24, 2021 at 11:22 AM

To: "Geoffrey T. Blackwell" <gblackwell@atheists.org>, Paul Byrd <paul@paulbyrdlawfirm.com>

Cc: Abtin Mehdizadegan <abtin@cgwg.com>

Thanks for the clarification on the specific requests. A little point of possible miscommunication - I was waiting for that clarification on RFP No. 4 before providing an answer as to whether he would agree to produce social media data. Let Paul and I visit with our client, and we will respond.

Sincerely,

**William C. Bird III**

Senior Assistant Attorney General

Office of Arkansas Attorney General Leslie Rutledge

**From:** Geoffrey T. Blackwell <gblackwell@atheists.org>

**Sent:** Tuesday, August 24, 2021 9:33 AM

**To:** William C. Bird III <william.bird@arkansasag.gov>; Paul Byrd <paul@paulbyrdlawfirm.com>

**Cc:** Abtin Mehdizadegan <abtin@cgwg.com>

**Subject:** American Atheists, et al. v. Rapert - Discovery matters

**EXTERNAL EMAIL**

[Quoted text hidden]

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**Geoffrey T. Blackwell** <gblackwell@atheists.org>

Tue, Aug 24, 2021 at 11:29 AM

To: "William C. Bird III" <william.bird@arkansasag.gov>

Cc: Paul Byrd <paul@paulbyrdlawfirm.com>, Abtin Mehdizadegan <abtin@cgwg.com>

Understood, William. Thank you.

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**Geoffrey T. Blackwell, Esq.**

(he/him/his)

Litigation Counsel

American Atheists Legal Center

American Atheists, Inc.

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